

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

District of \_\_\_\_\_

Division \_\_\_\_\_

JASON RAY  
 KIOWA NATIVIDAD  
 DAVID FARLEYTH.  
 SABIN MOIR  
 JUSTIN PRUETT

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

MARION COUNTY JAIL  
 SHERIFF NICK HUNTER

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 6:25-cv-00775-AN  
 (to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

JASON RAY  
 4000 HUMSVILLE HIGHWAY  
 SALEM MARION COUNTY  
 OREGON 97317

## B. The Defendant(s)

ALL PLAINTIFFS SAME  
 ADDRESS -

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

~~Marion County Jail~~  
Sheriff Mark Hunter  
4000 Huntsville Highway  
SALEM Marion  
OREGON 97317

## Defendant No. 2

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Ramsey  
Jail Commander  
4000 Huntsville Highway  
SALEM Marion  
OREGON 97317

## Defendant No. 3

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Deputy Danielson  
Jail Deputy  
4000 Huntsville Highway  
SALEM Marion  
OR 97317

## Defendant No. 4

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Aione MS  
Jail Deputy  
4000 Huntsville Highway  
SALEM Marion  
OREGON 97317

1 Plaintiff No. 4 Carlos V Cadena  
2 Name 16734232

3 Job title

4 City & Country

5 State & ZIP

6 Phone Number

7 E-mail

8 Plaintiff No. 5

9 Name

10 Job title

11 City & Country

12 State & ZIP

13 Phone Number

14 E-mail

15 Plaintiff No. 6

16 Name

17 Job title

18 City & Country

19 State & ZIP

20 Phone Number

21 E-mail

23

24

25

26

27

28



Plaintiff No. 1

Name: Jassan Ray

Job title: Plaintiff

Street address: 4000 Ainsville Hwy Salem, OR, 97317

City & Country: Salem, Marion

State & Z.P code OR, 97317

Phone Number

Email

Plaintiff No. 2

Name: ~~Plaintiff~~ Justin Platt

Job title: Plaintiff

Street address: 4000 Ainsville Hwy Salem, OR, 97317

City & Country: Salem, Marion

State & Z.P : OR, 97317

Phone Number

Email

Plaintiff No. 3

Name Ihiowa Natividad

Job title Plaintiff

Street address 4000 Ainsville Hwy Salem, OR, 97317

City & Country Salem, Marion

State & zip OR, 97317

Phone number

Email

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

CIVIL RIGHTS 1983 CLASS ACTION  
RACE, ADA VIOLATIONS - PRETRIAL  
DETENTION VIOLATIONS OF 14th amendment  
RIGHTS

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name)  
State of (name)

is a citizen of the

**b. If the plaintiff is a corporation**

The plaintiff, (name)  
under the laws of the State of (name)  
and has its principal place of business in the State of (name)

, is incorporated

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name)  
the State of (name)  
(foreign nation)

, is a citizen of  
Or is a citizen of



b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its  
principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

2.5 million dollars up to 40  
million not to exceed 40 million  
But no less than 2.5 million  
Per every 5 plaintiffs.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

In Marion county Jail all plaintiffs have been placed on max custody due to mental health issues for extended amount of time none of these individuals have shown any behavioral issues in weeks we are aloed 1 hr out at Am and 1 hr out at PM when two staff are available custody staff continue to not give us our hr out in the evenings because we are max custody even when there is enough staff causing Irreversible damage to our mental health, this is an ongoing etue & unusual situation.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

We are asking that the Federal government takes receivership for Marion county Jail & its deputies for the negligence that has gone on here, Irreversible damages caused by the keeper  
We are asking that \$2.5 million be split between all plaintiffs for the abusive Punishment by this Sheriff & his deputies  
for every 5 plaintiffs added, add \$2.5 million not to exceed \$40 million dollars

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

4-24-25

Signature of Plaintiff

Printed Name of Plaintiff

  
 Dason Ray
**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address



Att of claim REV #2 on 4/28/25 at 4:15 pm  
Dep - Patterson - steering delivered my AIC  
Guidance form to exhaust my Appeal process &  
remedys concerning this whole civil rights  
complaint without a deputies signature which  
is why they say they voided it although I  
turned it in directly to deputy "AICone" who  
is also a defendant in this case this is  
gross & malicious activities by several deputies  
to stop my guidance process & my lawsuits  
This should justify Immediate Intervention  
by the federal government to take over control  
to stop further gross negligent misconduct  
in the least I Implore the us magistrate to find  
in favor of all the plaintiff for this overwhelming  
burden of proof of severe misconduct of our  
14th amendment right of pretrial detainees





MARION COUNTY SHERIFF'S OFFICE  
INSTITUTIONS DIVISION

No 10336

**AIC GRIEVANCE FORM**

**INSTRUCTIONS:** Follow the rules in the AIC Handbook regarding the facility's grievance procedures. Fill in the blanks in the first two sections. If you need more room, use additional sheets of paper, not additional grievance forms. If you want to grieve more than one issue, use a grievance form for each issue.

**Reason for Grievance (Check One):**

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Conditions of Confinement | <input type="checkbox"/> Medical Care        | <input type="checkbox"/> General Classification Procedures     |
| <input type="checkbox"/> Participation in AIC Programs        | <input type="checkbox"/> Religious Practices | <input type="checkbox"/> Telephone, Mail & Visiting Procedures |
| <input type="checkbox"/> Prison Rape Elimination Act-PREA     | <input type="checkbox"/> Food Service        | <input type="checkbox"/> AIC Trust Accounts                    |

**AIC's Name:** JASON RAY **SID:** 11961959 **Cell:** 5-1-2048  
**Grievance:** on 4-18-25 OFFICER DUNALSON REFUSED TO  
GIVE MAXIMUM TIME OUT IN THE  
EVENING. ALTHOUGH HE GAVE MAX  
INMATES TIME OUT OF THEIR CELLS  
30 min. max inmates get 1 hour in the  
MORNING and one hour in the evening.  
**AIC Signature:** [Signature] **Date / Time:** 4-18-25, 7:05 PM

**Receiving Deputy Signature:** \_\_\_\_\_ **#** \_\_\_\_\_ **Date / Time:** \_\_\_\_\_

**Deputy's Response:**

This grievance is being voided because it lacks a deputy signature.

**Deputy's Signature:** \_\_\_\_\_ **#** \_\_\_\_\_ **Date / Time:** \_\_\_\_\_

**Acceptance of Resolution of Grievance:** \_\_\_\_\_ **Date / Time:** \_\_\_\_\_

**AIC's SIGNATURE**

**Supervisor's Review:**

**Date / Time Received:** \_\_\_\_\_

VOID

**Supervisor's Signature:** \_\_\_\_\_ **#** \_\_\_\_\_ **Date / Time:** \_\_\_\_\_

**Acceptance of Resolution of Grievance:** \_\_\_\_\_ **Date / Time:** \_\_\_\_\_

**AIC's SIGNATURE**

**Administrator's Review:**

**Date / Time Received:** \_\_\_\_\_

VOID

**Administrator's Signature:** \_\_\_\_\_ **#** \_\_\_\_\_ **Date / Time:** \_\_\_\_\_

**Acceptance of Resolution of Grievance:** \_\_\_\_\_ **Date / Time:** \_\_\_\_\_

**AIC's SIGNATURE**



Continue of # 10336

OFFICER DANIELSON PURPOSEFULLY  
DID NOT LET MARPC  
OUT THERE IS 2 OFFICERS  
THERE IS NO REASON  
WE SHOULD NOT GET  
OUR TIME OUT.

THIS CAN CONSTITUTE  
IRREVERSIBLE DAMAGES  
CAUSED AT THE HANDS  
OF A KEEPER ALSO  
CRUEL AND UNUSUAL  
PUNISHMENT BY A  
DEPUTY SHERIFF WHO HAS  
POWER OVER AN INDIVIDUAL  
DEPUTY DANIELSON TO BE  
RETRAINED AND A  
PERMANENT DISCIPLINARY  
NOTE ABOUT HIS CONDUCT  
TOWARDS HIC'S IN HIS  
PERMANENT FILE: ALSO  
POSSIBLE MONETARY CONSEQUENCES  
IF THIS CANNOT BE RESOLVED  
THANK YOU

ALSO USING D UNIT IS NOT  
AN EXCEPTIBLE ANSWER WHEN  
THERE IS ENOUGH STAFF TO  
RUN MARPC WITH RIGHT NOW  
IS 7 INMATES.



# Statement of Claim

## Att 2nd 1st For Cit Natividad

We want to show pressidence of how corrupt marian county sheriff is plaintiff Natividad spent 30 days on 22 hr lockdown with severe mental health issues most days 23-24 due to "not enough staff" alot of the time max of ssh inmates are locked down 23/24 hrs a day with no Access to our family/lawyers/mental health staff Inmate Natividad went before class. recd. ~~the~~ staff member darando ~~ex~~ classification staff extended his max 15 days because he was given the wrong food and he "calmly" asked for the right food witch is not a behavioral issue, as we are instructed to do just that with issues for our clothing, food, mail classification Darando Did not read the file just saw their was notes of Natividad "calmly" talking with staff and re-classed him without reason. every plaintiff has been bounced from classification, they are where housing inmates with no treatment.

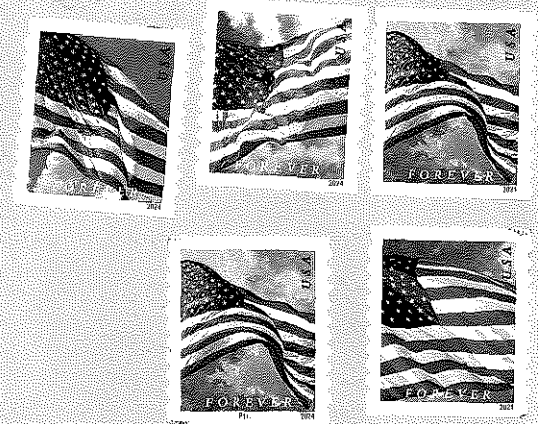


emergency Relife

the plaintiffs in said case come before you and ask the federal gov to force federal receivership & take custody of Marion county Jail, 11 people with mental health issues have died or had selfharm ~~injuries~~ in the last 6 months this lockdown is causing severe mental anguish and irreversible damage. We are pre-trial detainees & have not been convicted of a crime It is the job of the sheriff & deputies to make sure beyond a reasonable doubt that our safety, security & mental health are taken care of with are grossly miss handled.



Name: Taggou Ray  
SID# 11961454  
LEGAL/OFFICIAL MAIL ONLY  
Marion County Sheriff's Office-Jail  
4000 Aumsville Hwy SE  
Salem, OR 97317



US District Court  
Office of the clerk  
Suite 740  
1000 SW Third Ave  
Portland OR 97204

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